

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND**

In Re:

Ollie B. King

Debtor(s)

Case No. **14-18410-DER**

Chapter 13

**TRUSTEE'S MOTION FOR DISALLOWANCE OF CLAIM AS TO WHICH THE
CLAIMANT HAS REFUSED DISTRIBUTIONS**

Nancy Spencer Grigsby, Chapter 13 Trustee in the above-captioned case ("Trustee"), pursuant to section 502 of the Bankruptcy Code and Bankruptcy Rule 3007, request the Court to disallow the proof of claim filed on behalf of Freedom Mortgage Corp. c/o LoanCare, LLC ("Claimant") filed on October 1, 2014 in the amount of \$297,400.70 with an arrearage of \$12,348.17 (the "Claim"). The Claimant has: (1) refused to accept distributions made pursuant to the plan confirmed in the case; (2) advised the Trustee that collateral securing the claim has been or will be executed upon; and (3) failed either to withdraw the Claim or to amend the Claim to resulting from the execution. The balance of the Claim should be disallowed to permit plan funds to be disbursed to other creditors.

WHEREFORE, the Trustee prays that the Court disallow the Claim.

Respectfully submitted,

Date: March 15, 2016

/s/ Nancy Spencer Grigsby

Nancy Spencer Grigsby

Chapter 13 Trustee

4201 Mitchellville Road #401

Bowie, Maryland 20716

ngrigsby@ch13md.com

PLEASE TAKE NOTICE that: (1) within thirty (30) days after the date on the certificate of service of the objection, the claimant may file and serve a memorandum in opposition, together with any documents and other evidence the claimant wishes to attach in support of its claim, unless the claimant wishes to rely solely upon the proof of claim; and (2) an interested party may request a hearing that will be held in the courts discretion.

CERTIFICATE OF SERVICE

I hereby certify that this Motion to Disallow was served on March 15, 2016 electronically to those recipients authorized to receive a Notice of Electronic Filing by the Court, and/or by first class mail, postage prepaid to:

Ollie B. King
9500 Sidebrook Rd.
#201
Owings Mills, MD 21117
Debtor(s)

Kim Parker, Esq.
2123 Maryland Ave.
Baltimore, MD 21218
Attorney for the Debtor(s)

LoanCare, LLC
3637 Sentara Way
Virginia Beach, VA 23452
Creditor's Address on Claim

Kyle J. Moulding, Esq.
312 Marshall Ave., Ste 800
Laurel, MD 20707
Attorney for Creditor

The Corporation Trust Incorporated
351 West Camden St.
Baltimore, MD 21201
Resident Agent

LoanCare
PO Box 8068
Virginia Beach, VA 23450-4968
Creditor Correspondence Address

/s/ Nancy Spencer Grigsby
Chapter 13 Trustee